STATE OF ILLINOIS SECRETARY OF STATE SECURITIES DEPARTMENT

IN THE MATTER OF: SELECT LIBERTY FINANCIAL

GROUP, LLC

ITS OFFICERS, DIRECTORS,

EMPLOYEES, AFFILIATES, SUCCESSORS,)

AGENTS AND ASSIGNS AND TOMMIE BELL

)File No.1200251

ORDER OF PROHIBITION

TO THE RESPONDENT: Select Liberty Financial Group, LLC

Tommie Bell

Substitute Service:

Secretary of State Index Department

WHEREAS, a Temporary Order of Prohibition was issued by the Secretary of State on January 30, 2013 prohibiting Select Liberty Financial Group, LLC (its Officers, Directors, Employees, Affiliates, Successors, Agents and Assigns) and Tommie Bell from rendering investment advice in the State of Illinois until further order of the Secretary of State.

WHEREAS, pursuant to Section 11.F of the Illinois Securities Law of 1953 [815 ILCS 5/1 et seq.] (the "Act"), the failure to request a hearing within thirty days of the entry of the Temporary Order of Prohibition shall constitute a sufficient basis to make the Temporary Order final.

WHEREAS, Select Liberty Financial Group, LLC (its Officers, Directors, Employees, Affiliates, Successors, Agents and Assigns) and Tommie Bell have failed to request a hearing on the matters contained in said Temporary Order within thirty days of the entry of said Temporary Order and are hereby deemed to have admitted the facts alleged in said Temporary Order.

WHEREAS, the Secretary of State, by and through his duly authorized representative, has adopted the Findings of Fact contained in said Temporary Order as the Secretary of State's final Findings of Fact as follows:

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- 1. That Respondent, Select Liberty Financial Group, LLC, purports to be a limited liability company registered in India.
- 2. That Respondent, Select Liberty Financial Group, LLC, purports to be located at 657 W. Port Royale Lane, Tucson, Arizona 85701 in the United States. The address does not exist according to the United States Postal Service.
- That, on an investment blog website, Respondent, Select Liberty Financial Group, LLC, purports to have its main office at Level 2 Kalpataru Synergy, Opposite Grand Hyatt Santacruz, Mumbai: 400 075 INDIA. The address is the location of The Executive Centre at Kalpataru Synergy, Mumbai, which provides temporary executive office space and virtual offices, allowing businesses to have a corporate address and phone answering services, among other amenities.
- 4. That Respondent, Select Liberty Financial Group, LLC, has a website, www.selectliberty.com, advertising that it specializes in providing advice regarding the following investments:
 - Private Placement Ventures
 - Medium Term Notes (MTNs)
 - Various Companies Shares
 - Venture Capital Project Development
 - Annuities
 - Real Estate Acquisitions
 - Private Equity
 - Precious Metals
 - Oil
 - Diamonds
 - Gold
- 5. That, on the aforementioned website, Respondent, Select Liberty Financial Group, LLC, purports to be "an Privately owned diversified Cash flow and wealth management firm" [sic], established in 2006 by experts with over thirty (30) years of investment experience.
- That Respondent, Select Liberty Financial Group, LLC, previously admitted on the aforementioned website that

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it is not licensed to be a securities dealer, broker or investment advisor and claimed that any transactions on the site would be considered private placements. However, as of this writing, that language has been removed from the website.

- 7. That the aforementioned website currently states that Respondent, Select Liberty Financial Group, LLC, provides "clients with the regulatory and compliance expertise necessary to meet the ever changing challenges of the current regulatory environment".
- 8. That the aforementioned website was registered on December 8, 2011 by Tucows, Inc. for a private customer.
- 9. That Respondent, Tommie Bell, sent spam emails soliciting investors, including at least one Illinois resident, for www.selectliberty.com.
- 10. That Respondent, Tommie Bell, updated the company profile for Select Liberty Financial Group, LLC on www.manta.com where the only address provided for the company is "Tucson, AZ 85701".
- 11. That on LinkedIn.com, there is a Select Liberty Financial Group which was created on January 25, 2012 by a "Tommie B." The link for Tommie B. takes users of the website to the profile for Tommie Bell, a "Manager" in Minneapolis, Minnesota in the Financial Services Industry.
- 12. That the above-mentioned Respondents, Select Liberty Financial Group, LLC and Tommie Bell, are investment advisers as that term is defined pursuant to Section 2.11 of the Act.
- 13. That Section 8 of the Act provides, <u>inter alia</u>, that every investment adviser shall be registered as such with the Secretary of State.
- 14. That Section 12.C of the Act provides, inter alia, that it shall be a violation of the Act for any person to act as an investment adviser unless registered as required under the Act.
- 15. That Section 12.J of the Act provides, inter alia, that it shall be a violation of the Act to (i) employ any device, scheme or artifice to defraud in connection

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with the sale or purchase of any security, directly or indirectly; (ii) engage in any transaction, practice or course of business which operates as a fraud or deceit upon any client or prospective client; or (iii) engage in any act, practice or course of business which is fraudulent, deceptive or manipulative while acting as an investment adviser.

- That at all times relevant hereto, the Respondents, Select Liberty Financial Group, LLC (its Officers, Directors, Employees, Affiliates, Successors, Agents and Assigns) and Tommie Bell, failed to register as investment advisers prior to the offer and/or sale of services in the State of Illinois.
- 17. That at all times relevant hereto, the Respondents, Select Liberty Financial Group, LLC (its Officers, Directors, Employees, Affiliates, Successors, Agents and Assigns) and Tommie Bell, while acting as an investment adviser deceived prospective clients as to the legality of Respondents' services and Respondents' location.

WHEREAS, the Secretary of State, by and though his duly authorized representative, has adopted the Conclusions of Law contained in said Temporary Order as the Secretary of State's final Conclusions of Law as follows:

- 18. That by virtue of the foregoing, the Respondents, Select Liberty Financial Group, LLC (its Officers, Directors, Employees, Affiliates, Successors, Agents and Assigns) and Tommie Bell, have violated Sections 12.A, 12.C and 12.J of the Act.
- 19. That by virtue of the foregoing, Respondents, Select Liberty Financial Group, LLC (its Officers, Directors, Employees, Affiliates, Successors, Agents and Assigns) and Tommie Bell, are subject to a fine of up to \$10,000 per violation, costs of investigation, reasonable expenses, an order of censure and an order which permanently prohibits the Respondent from rendering investment advice in the State of Illinois.

NOW THEREFORE, IT IS HEREBY ORDERED THAT: pursuant to the authority granted by Section 11.F of the Act, Select Liberty Financial Group, LLC (its Officers, Directors, Employees, Affiliates, Successors, Agents and Assigns) and Tommie Bell are

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hereby PROHIBITED from rendering investment advice in the State of Illinois.

ENTERED: This

day of

, 2013

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Secretary of State State of Illinois

NOTICE: Failure to comply with the terms of this Order shall be a violation of the Section 12.D of the Act. Any person or entity who fails to comply with the terms of this Order of the Secretary of State, having knowledge of the existence of the Order, shall be guilty of a Class 4 felony for each offense.

This is a final order subject to administrative review pursuant to the Administrative Review Law, [735 ILCS 5/3-101 et seq.] and the Rules and Regulations of the Illinois Securities Act, [14 Ill. Admin. Code Ch. I, Section 130.1123]. Any action for Judicial Review must be commenced within thirty-five (35) days from the date a copy of this Order is served upon the party seeking review.

Attorney for the Secretary of State: Shannon Bond Illinois Securities Department 300 W. Jefferson St., Suite 300A Springfield, Illinois 62702 Telephone: (217) 524-0648